

1 MICHAEL C. KANE, ESQ.
Nevada Bar No. 10096
2 BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857
3 JOEL S. HENGSTLER, ESQ.
Nevada Bar No. 11597
4 **THE702FIRM INJURY ATTORNEYS**
8335 West Flamingo Road
Las Vegas, Nevada 89147
5 Telephone: (702) 776-3333
Facsimile: (702) 505-9787
6 **E-Mail:** service@the702firm.com

7 GEOFFREY C. PARKER
Nevada Bar No. 16952
8 **HILTON PARKER LLC**
7658 Slate Ridge Boulevard
9 Reynoldsburg, Ohio 43068
Telephone: (614) 992-2277
10 Facsimile: (614) 927-5980
11 **E-Mail:** gparker@hiltonparker.com

12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 CHRISTINA T., pseudonymously,

14 Plaintiff,

15 vs.

16 BELLAGIO LLC, et al.,

17 Defendants.

Case No. : 2:25-cv-145

STIPULATION AND ORDER
TO EXTEND THE BRIEFING
SCHEDULE PERTAINING TO
DEFENDANTS' PENDING
MOTIONS TO DISMISS

(FIRST REQUEST)

19 Plaintiff Christina T. ("Plaintiff") and Defendants Bellagio LLC; Desert Palace LLC;
20 Nevada Property 1 LLC; Flamingo Las Vegas Operating Company LLC; Mandalay Bay Resort
21 Group LLC; MGM Grand Hotel LLC; MGM Grand Propco LLC; FP Holdings, L.P.; Venetian
22 Las Vegas Gaming, LLC; and Wynn Las Vegas, LLC (collectively "Defendants" and, together
23 with Plaintiff, the "Parties"), by and through their respective counsel of record, hereby agree and
24 stipulate as follows:

25 1. On January 28, 2025, the Parties stipulated to extend Defendants' time to answer
26 or otherwise respond to Plaintiff's complaint by 21 days to February 20, 2025. (ECF No. 9.)

27 2. On January 29, 2025, the Court granted the stipulated extension. (ECF No. 11.)

3. On February 20, 2025, Defendants filed a total of five motions to dismiss Plaintiff's Complaint. (ECF Nos. 21, 23, 28, 30 & 31.)

4. Pursuant to LR 7-2(b), Plaintiff's responses to Defendants' motions to dismiss are due on March 6, 2025.

5. The Parties agree, stipulate, and respectfully request that the Court extend the deadline for Plaintiff to respond to Defendants' pending motions to dismiss by fourteen (14) days, making her deadline to respond March 20, 2025.

6. The Parties further agree, stipulate, and respectfully request that the Court extend the deadline for Defendants to file their replies in support of their motions to dismiss (if any) by fourteen (14) days, placing each Defendant's reply deadline twenty-one (21) days after the filing of Plaintiff's relevant response (i.e. April 10, 2025 if Plaintiff responds on March 20, 2025).

7. This extension is necessary to provide the Parties' counsel sufficient time to review and respond to the arguments made in, and in relation to, the pending motions to dismiss.

8. This is the first stipulation for an extension of the time for Plaintiff to respond to Defendants' motions to dismiss, and it is also the first stipulation for an extension of the time for Defendants to reply in support of the same.

IT IS SO STIPULATED.

DATED this 25th day of February, 2025.

Respectfully submitted,

/s/ Geoffrey C. Parker
GEOFFREY C. PARKER, ESQ.
Nevada Bar No. 16952
HILTON PARKER LLC
Ohio Bar No. 0095742
7658 Slate Ridge Boulevard
Reynoldsburg, Ohio 43068
MICHAEL C. KANE, ESQ.
Nevada Bar No. 10096
BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857
JOEL S. HENGSTLER, ESQ.
Nevada Bar No. 11597
THE702FIRM INJURY ATTORNEYS
8335 West Flamingo Road
Las Vegas, Nevada 89147

/s/ Allison L. McQueen
Patrick G. Byrne, Esq.
Nevada Bar No. 7636
Dawn Davis, Esq.
Nevada Bar No. 13329
SNELL & WILMER
1700 South Pavilion Center Drive, Suite 700
Las Vegas, NV 89135
Telephone: (702) 784-5275
Facsimile: (702) 784-5252
Email: pbyrne@swlaw.com
ddavis@swlaw.com

Bethany K. Biesenthal, Esq. (*Pro Hac Vice*)
Allison L. McQueen, Esq. (*Pro Hac Vice*)
JONES DAY
110 North Wacker Drive, Suite 4800
Chicago, IL 60606

Counsel for Plaintiff Christina T.

Telephone: (312) 782-3939
Facsimile: (312) 782-8585
Email: bbiesenthal@jonesday.com
amcqueen@jonesday.com

Nicole M. Perry, Esq. (*Pro Hac Vice*)
JONES DAY
717 Texas Street, Suite 3300
Houston, TX 77002
Telephone: (832) 239-3939
Facsimile: (832) 239-3600
Email: nmperry@jonesday.com

Counsel for Defendant Wynn Las Vegas, LLC

/s/ Robert A. Ryan
Robert A. Ryan, Esq.
Nevada Bar No. 12084
KNIGHT & RYAN PLLC
8880 W. Sunset Rd., Suite 130
Las Vegas, NV 89148
Telephone: (702) 462-6083
Facsimile: (702) 462-6048
Email: robert@knightryan.com

*Counsel for Defendants Bellagio LLC, Nevada
Property 1, LLC, Mandalay Bay Resort Group
LLC, MGM Grand Hotel LLC, and MGM
Grand Propco LLC*

/s/ Kristin T. Gallagher
Kristen T. Gallagher, Esq.
Nevada Bar No. 9561
MCDONALD CARANO LLP
2300 W. Sahara Ave., Suite 1200
Las Vegas, NV 89102
Telephone: (702) 873-4100
Email: kgallagher@mcdonaldcarano.com

Ann H. MacDonald, Esq. (*Pro Hac Vice*)
ARENTFOX SCHIFF LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5548
Facsimile: (312) 258-5600
Email: ann.macdonald@afslaw.com

Elise Yu, Esq. (*Pro Hac Vice*)
ARENTFOX SCHIFF LLP
350 South Main Street, Suite 210
Ann Arbor, MI 48104
Telephone: (734) 222-1556
Facsimile: (734) 222-1501
Email: elise.yu@afslaw.com

*Counsel for Defendants Desert Palace LLC
and Flamingo Las Vegas Operating Company
LLC*

/s/ Justin W. Smerber
Justin W. Smerber, Esq.
Nevada Bar No. 10761
BRANDON SMERBER LAW FIRM
139 E. Warm Springs Rd.
Las Vegas, NV 89119
Telephone: (702) 380-0007
Facsimile: (702) 380-2964
Email: j.smerber@bsnv.law

Counsel for Defendant FP Holdings, L.P.

/s/ Nathanael R. Rulis
Nathanael R. Rulis, Esq.
Nevada Bar No. 11259
KEMP JONES, LLP
3800 Howard Hughes Parkway, Suite 1700
Las Vegas, NV 89169
Telephone: (702) 385-6000
Facsimile: (702) 385-6001
Email: n.rulis@kempjones.com

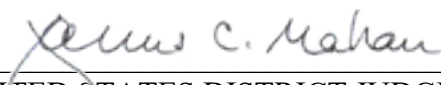
David Sager, Esq. (*Pro Hac Vice*)
DLA PIPER LLP (US)

1 51 John F. Kennedy Parkway, Suite 120
2 Short Hills, NJ 07078
3 Telephone: (973) 520-2570
4 Facsimile: (973) 520-2551
5 Email: david.sager@dlapiper.com

6 Kyle T. Orne, Esq. (Pro Hac Vice)
7 DLA PIPER LLP (US)
8 2525 East Camelback Road, Suite 1000
9 Phoenix, AZ 85016
10 Telephone: (480) 606-5172
11 Facsimile: (480) 606-5527
12 Email: kyle.orne@dlapiper.com

13 *Counsel for Defendant Venetian Las Vegas*
14 *Gaming, LLC*

15 IT IS SO ORDERED.

16 
17 _____
18 UNITED STATES DISTRICT JUDGE

19 DATED: February 26, 2025
20 _____
21
22
23
24
25
26
27
28